

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 24-cv-80395-RLR

DR. JEFF ISAACS,

Plaintiff,

vs.

GOOGLE, LLC,

Defendant.

/

**DEFENDANT GOOGLE, LLC'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1(a)(1)(J), Defendant Google, LLC ("Google") respectfully requests the entry of an order extending its deadline to respond to Plaintiff's Complaint though August 15, 2024, and in support thereof Google states as follows:

1. Plaintiff commenced this action on April 1, 2024, with the filing of his Complaint against Google. D.E. 1.
2. On May 22, 2024, the Court issued an order directing Plaintiff to complete timely service of process or show cause why the case should not be dismissed for failure to serve corporate defendant Google. D.E. 9.
3. Though *pro se* Plaintiff has not filed a proof of service, Google did receive service of the Complaint on June 25, 2024.
4. On July 2, 2024, the Court dismissed the case without prejudice for lack of proof of service. D.E. 12.
5. On July 2, 2024, Google contacted Plaintiff to acknowledge service and to confer

regarding an extension of time to respond to the Complaint from July 16, 2024, to August 15, 2024. Plaintiff agreed to the proposed extension of time on that same date.

6. On July 8, 2024, Plaintiff filed the executed summons on the docket in this action.

7. Google respectfully requests an extension of time to respond to the Complaint through August 15, 2024, to provide adequate time to investigate the allegations and in consideration of the intervening Independence Day holiday.

8. This motion is made in good faith and not for the purposes of delay. The brief extension requested will not prejudice any party.

WHEREFORE, Google respectfully requests that the Court enter an order extending the deadline for it to respond to the Complaint through August 15, 2024.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), the undersigned counsel certifies that she conferred with Plaintiff regarding the requested relief and that Plaintiff agreed to the relief requested.

Dated: July 10, 2024

Respectfully submitted,

By: /s/ Ana M. Barton

Ana M. Barton

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Counsel for Google, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically filed with the Clerk of Court and served via transmission of Notice of Electronic Filing generated by CM/ECF on all counsel or parties of record, on this 10th day of July, 2024.

By: /s/ Ana M. Barton
Ana M. Barton